

# **Ex. E**

## **Frank Tang Declaration**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**Ameriway Corporation**

Plaintiff,

v.

**May Yan Chen,**

**Ability Customs, Inc.,**

Defendants.

**19-cv-09407 (VSB) (VF)**

**DECLARATION OF FRANK TANG**

1. My Name is Frank Tang.
2. Attached is a true and correct copy of my driver's license.
3. I was an employee of Ameriway Corporation from August, 2018 to May, 2019.
4. My primarily responsibilities at Ameriway included coordinating customs clearance and freight movement with its vendors, suppliers and contractors.
5. I routinely sent emails to May Yan Chen and Ability Customs Brokers on issues relating to custom clearance and freight movement of Ameriway's containers during my employment with Ameriway.
6. I routinely called May Yan Chen and her employees on issues relating to customs clearance and freight movement of Ameriway's containers during my employment with Ameriway.
7. Upon my resignation around May 2019, I gave Pete Wolfram access to all my Ameriway accounts including my email account at [frank.tang@ameriwaycorp.com](mailto:frank.tang@ameriwaycorp.com).
8. I gave Mr. Wolfram access to my Ameriway accounts so that Mr. Wolfram can handle unfinished matters that I was dealing with on behalf of Ameriway.
9. This arrangement was made with the consent of Ameriway's management.
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2022

  

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Frank Tang





# DRIVER'S LICENSE

NOT FOR REAL ID PURPOSES

DUPS: 00

DLN: 25 569 047

FT79

3

4b EXP: 03/29/2025

4a ISS: 12/15/2020

1 TANG  
2 FRANK K C



15 SEX: M 18 EYES: BRO  
16 HGT: 5'-07"

9 CLASS: C  
9a END: NONE  
12 RESTR: 1

*John Tang*

5 DD: 2035100101604  
FT79 000000013440



ORGAN DONOR

